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**BY ECF**

Honorable Robert M. Levy  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Cooper v. City of New York, et al.*, 14-CV-1761 (RJD)(RML)

Your Honor:

I represent plaintiffs in this matter and write to respectfully request that the Court issue an order compelling the defendants to produce their personnel records by December 1, 2015. While defendants do not dispute the discoverability of these documents, they oppose this motion.

Pursuant to Plaintiff's discovery demands, defendants have produced certain records from defendants' personnel file. The most recent of these records is dated in 2007. During a recent deposition, plaintiff learned that undisclosed personnel records could be highly relevant and asked defendants to provide these missing documents. Despite repeated requests, defendants have failed to do so. This failure is among the reasons that plaintiff has been unable to conduct certain depositions.

Accordingly, I respectfully request that Your Honor compel the defendants to produce the updated personnel files by December 1, 2015.

Yours truly,

/ss/

Robert Marinelli